

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

DAIMLER TRUCKS NORTH AMERICA  
LLC, a Delaware limited liability company,  
f/k/a FREIGHTLINER LLC, a Delaware  
limited liability company,

Plaintiff,

v.

RAMIN YOUNESSI, an Illinois resident,

Defendant.

Case No. 08-cv-2893

The Honorable Joan H. Lefkow

Magistrate Judge Morton Denlow

**NOTICE OF MOTION**

TO: See attached Certificate of Service

Please take notice that on **Tuesday, May 27, 2008 at 9:30 a.m.**, or as soon thereafter as counsel may be heard, the undersigned counsel for Plaintiff Daimler Trucks North America LLC, f/k/a Freightliner LLC, shall appear before the Honorable Joan H. Lefkow in Room 1925 of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and then and there present **Plaintiff's Motion to Quash Subpoenas Served On John D. Rea, Alberto Gerena And Luigi Castillo Or, In The Alternative, For A Protective Order**, a copy of which is attached and hereby served on you.

Dated: May 20, 2008

Respectfully submitted,

DAIMLER TRUCKS NORTH AMERICA  
LLC, f/k/a FREIGHTLINER LLC

By:           /s/ Daniel M. Cordis            
One of Its Attorneys

Martin J. Bishop (IL Bar No. 06269425)  
Daniel M. Cordis (IL Bar No. 6285963)  
FOLEY & LARDNER LLP  
321 North Clark Street  
Suite 2800  
Chicago, Illinois 60610  
312.832.4500 (t)  
312.832.4700 (f)

Susan K. Eggum, OSB No. 824576  
Paul A. C. Berg, OSB No. 062738  
COSGRAVE VERGEER KESTER LLP  
805 SW Broadway, 8th Floor  
Portland, Oregon 97205  
503.323.9000 (t)  
503.323.9019 (f)  
*Motions To Appear Pro Hac Vice Pending*

**CERTIFICATE OF SERVICE**

I, Daniel M. Cordis, hereby certify that on May 20, 2008 I caused to be served a true and correct copy of the foregoing **Notice of Motion** relating to the previously filed and served Plaintiff's Motion To Quash Third-Party Subpoenas Or, In The Alternative, For A Protective Order by hand delivery on the following individuals:

Robin Hulshizer  
Mark Mester  
Alan Devlin  
Cameron Krieger  
Latham & Watkins LLP  
Sears Tower, Suite 5800  
233 South Wacker Drive  
Chicago, IL 60606  
Of Attorneys for Defendant Ramin Younessi

I, Daniel M. Cordis, hereby certify that on May 20, 2008 I caused to be served a true and correct copy of the foregoing **Notice of Motion** relating to the previously filed and served Plaintiff's Motion To Quash Third-Party Subpoenas Or, In The Alternative, For A Protective Order by depositing the same in the U.S. mail chute at 321 North Clark Street, Chicago, Illinois 60610, postage prepaid, and addressed to the following individual:

Bruce C. Hamlin  
Lane Powell PC  
601 SW 2nd Ave., Suite 2100  
Portland, OR 97204  
Of Attorneys for Defendant Younessi

/s/ Daniel M. Cordis

Daniel M. Cordis